

The Honorable Timothy W. Dore Chapter 7

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

In Re: } Chapter 7
 } No. 20-12450

BEVERLY JANE CARY)
) EX PARTE MOTION FOR ORDER
) APPOINTING ATTORNEY
) FOR TRUSTEE
 D-14)

Debtor

COMES NOW Ronald G. Brown, Chapter 7 Trustee of the bankruptcy estate for Beverly Jane Cary, and moves for authority to employ Rory Livesey and The Livesey Law Firm, whose address is 600 Stewart Street, Suite 1908, Seattle, Washington 98101, to serve as attorney for trustee to represent the bankruptcy as follows:

1. The bankruptcy estate requires the assistance of counsel to investigate lien claims against the debtor's real property at 27834 31st Place South, Auburn, Washington, and if appropriate, pursue any avoidance actions and the liquidation or other disposition of the debtor's assets.

2. Counsel will prepare such pleadings, motions, notices and orders, as may be necessary after further investigation, to represent the trustee and the bankruptcy estate in legal proceedings as required.

3. The attorney states in an accompanying declaration that he does not hold or represent an interest adverse to the estate. The trustee requests that the attorney be hired on a general retainer basis. The attorney states in an attachment to his declaration that his hourly billing rate is \$385 per hour and his legal assistant's hourly rate is \$155 per hour.

**EX PARTE MOTION FOR ORDER
APPOINTING ATTORNEY FOR TRUSTEE - 1**

RONALD G. BROWN
ATTORNEY AT LAW
2525 WELLS FARGO CENTER
999 THIRD AVENUE
SEATTLE, WASHINGTON 98104
(206) 342-7850 TELEPHONE
Ronald G. Brown

1 4. To the best of the applicant's knowledge, the attorney has no connection nor business
2 dealings with the debtor, creditors, any party in interest, their respective attorneys and accountants,
3 the United States Trustee, or any person employed in the office of the United States Trustee, which
4 would prevent the attorney from providing services to me as Trustee. The attorney is regularly
5 employed in other cases in which I am a trustee.

6 5. The attorney will be paid only after application to and approval by the Bankruptcy Court
7 of the reasonableness of the compensation requested. No retainer has been paid by the trustee.

8 DATED this 3rd day of March, 2021.

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10 */s/ Ronald G. Brown*
11 Ronald G. Brown, WSBA #8816
12 Chapter 7 Trustee

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28 EX PARTE MOTION FOR ORDER
 APPOINTING ATTORNEY FOR TRUSTEE - 2

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